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July 31, 2017

VIA ECF

The Honorable Katherine H. Parker
United States Magistrate Judge
United States District Court – S.D.N.Y.
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

**Re: City of Almaty, Kazakhstan, et ano. v. Mukhtar Ablyazov, et al.,
Case No. 15-CV-5345 (AJN)(KHP)**

Dear Judge Parker:

We represent Triadou SPV S.A. (“Triadou”) and, pursuant to Rule III.C of Your Honor’s Individual Practices, write to request a two-page enlargement for a letter-motion Triadou intends to file to compel the deposition of the key witness of the City of Almaty and BTA Bank (together, “Almaty/BTA”) – Nicolas Bourg. Triadou has conferred with counsel for Almaty/BTA, who consent to this request.

Triadou respectfully requests this page enlargement for its letter-motion or alternative request for a pre-motion conference because of (i) the nature of the relief Triadou seeks, (ii) the long and complex evolution of this issue, and (iii) the undisputed importance of deposing Mr. Bourg. Triadou has tailored its request to seek a minor enlargement, and therefore submits that its request is fair and reasonable under the circumstances.

Lastly, counsel for Almaty/BTA have asked Triadou to include in this letter their request for an additional two pages for their opposition to Triadou’s letter-motion/pre-motion request, to which Triadou consents.

Thank you for your consideration.

Respectfully submitted,

s/ Deborah A. Skakel
Deborah A. Skakel

cc: All Counsel of Record (via ECF)